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MAR 25 2010
FCC Mail Room

March 20, 2010

Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Attention: Marlene H. Dortch, Secretary

Dear Ms. Dortch,

Please accept my comments on WT Docket No. 09-209 (FCC 09-102.) This is a Notice of Proposed Rulemaking entitled: Amendment of the Amateur Service Rules Governing Vanity and Club Station Call Signs.

Please route these copies to the appropriate people.

Thank you,

Sincerely,



FREDERICK O. MAIA, W5YI
1020 Byron Lane
Arlington, TX 76012

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MAR 25 2010

FCC Mail Room

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Amendment of Amateur Service Rules)
Governing Vanity and Club Station Call Signs) WT Docket No. 09-209
)
)

COMMENTS ON WT DOCKET NO. 09-209

To: The Commission

I, Frederick O. Maia, have been a Commission licensee for over 50 years and have been involved in rulemaking affecting the Amateur Radio Service for many decades. I hold an Extra Class amateur radio license with the call sign: W5YI.

In the early 1980's, I formed the W5YI Group, Inc. On June 12, 1984, the W5YI Group was the first to be accepted to assist the Commission with the preparation and administration of amateur radio license examinations on a national basis. The following year, the *National Conference of Volunteer Examiner Co-ordinators* (NCVEC) was formed to standardize testing among the many different Volunteer Examiner Coordinators that had been appointed by the FCC.

In 2000, at the age of 65, I retired from full time service with the W5YI Group, and W5YI-VEC, Inc. I still continue, however, as a consultant to the W5YI Group and currently am a director of the W5YI-VEC. In 2001, I started a "vanity" call sign filing service and since then, have assisted thousands of radioamateurs to obtain a vanity call sign.

These comments are being submitted as an individual rather than as part of the *National Conference of VEC's* (NCVEC), the W5YI-VEC or The W5YI Group.

I. BACKGROUND

Station call signs are of **monumental** importance to amateur radio operators. They are, in fact, more important than the individual's name on the amateur airwaves since call signs are used to refer to individual operators. Very few amateurs really know the full names of other operators; instead only their first (or nickname) and their station call sign. An operator is known by his/her assigned call sign and, in effect, it becomes the name of the operator as well.

Group "A" format call signs¹ – especially 1x2 and to a lesser extent, 2x1 format call signs available only to Extra Class level radioamateurs – are in particular demand by vanity call sign applicants. These preferential call signs are desirable because they are shorter (easier to transmit), publicly denote their top-of-the-line license status and (supposedly) their higher level of technical and/or operating ability since they had to pass a difficult license exam. Since 1996, amateurs have been able to apply for these call sign formats under the vanity call sign system.

A major vanity call sign problem is that there are only about 20 thousand 1x2 and 23 thousand 2x1 format call signs available for assignment. And there are over 120 thousand eligible Extra Class amateurs who desire them. As a result of the vanity call sign program, preferential 1x2 and 2x1 call signs are quickly chosen when they become available and nearly all of these call signs have been assigned. None are available in many call sign (numeric) districts and amateurs must compete for these call signs when they become available, usually 2 years following expiration or cancellation of the call sign.

Adding to the shortage of desirable call signs is the fact the few radioamateurs seem to understand the extremely complex rules surrounding the availability, application and eligibility requirements of specific vanity call signs.

II. INTRODUCTION

On November 23, 2009, the Commission adopted a *Notice of Proposed Rule Making (Notice)* seeking public comments on a proposal to amend certain rules governing the amateur service vanity call sign system. The primary objective was to make the vanity call sign application and assignment procedures more equitable to individual radioamateurs and clubs that wish to change their station call signs.

The Commission also proposed to state certain existing long term vanity call sign policies in the Part 97 amateur service rules which previously were covered in the vanity call sign section of the FCC's amateur service website.

The *Notice of Proposed Rulemaking* in WT Docket No. 09-209 (FCC 09-102) appeared in *Federal Register* on January 25, 2010. Public Comments are due 60 days after publishing (until March 26, 2010); therefore these comments are timely filed.

III. WT DOCKET NO. 09-209 PROPOSALS

¹ A Group "A" 1x2 format call sign contains one prefix letter (K, N or W), a geographical numeral (a single digit 0-9) and two suffix letters (AA through ZZ). A 2x1 format call sign contains 2 prefix letters (AA-AL, KA-KZ, NA-NZ and WA-WX), a geographical numeral (0-9) and one suffix letter (A-Z). Some two letter call sign prefixes (AH, AL, KH, KL, KP, NH, NL, NP, WH, WL and WP) are restricted to applicants with mailing addresses in certain non-US mainland geographical areas.

In the *Notice*, the Commission specifically asked for public comment on the following:

(a.) To make the knowledge and availability of deceased call signs more readily available to the general amateur community, the FCC has proposed to amend its rules to provide that the canceled call sign of a deceased amateur is not available for thirty days following the date the FCC staff takes action to cancel the license.

(b.) The FCC previously defined "close relatives" to include "in-laws" of the deceased former holder. In order to avoid any confusion, the FCC proposes to redefine the term "in-law" to include only a parent or stepparent of a licensee's spouse; a licensee's spouse's sibling (brother or sister); the spouse of a licensee's spouse's sibling; or the spouse of a licensee's sibling, child, or stepchild.

(c.) The Commission proposes to specifically state in the rules:

(i) "Where a vanity call sign for which the most recent recipient was ineligible is surrendered, cancelled, revoked or voided, the 2 year requirement does not apply." and;

(ii) Former holders need not wait 2 years following call sign expiration or cancellation to reclaim the call sign.

(d.) The FCC wants to limit club stations to holding only one license grant and one station call sign. Clubs that currently hold more than one call sign would not be allowed to obtain any more call signs, but could renew or modify their existing station licenses.

(e.) The FCC proposes to permit Novice Class licensees to serve as club station trustees.

(f.) Finally, the FCC invited additional proposals for other amendments to the rules governing the vanity call sign system and club station licensing.

IV. AVAILABILITY OF STATION CALL SIGNS

An expired or canceled call sign is routinely available for reassignment under the vanity call sign system 2 years plus one day after expiration or cancellation whichever is sooner.²

² See Section § 97.19(c)(3)

There are several private sector, radioamateur-authored websites³ that indicate when call signs are – or shortly will be – available to the vanity call sign system. Many call sign applicants check these sites on a daily basis and some sites have better or more detailed information than others. Unfortunately, not all information is correct or is lacking in additional important information.

This information is compiled by the website authors by searching the FCC's amateur service database for currently cancelled call signs and license expirations. Few amateurs seem to know that the FCC, also offers an online searchable database that can be set to generate listings of expired and canceled station call signs over a defined date range.⁴

Many applicants – especially recently licensed amateurs – are totally unaware that these sites exist and blindly select active call signs, call signs with invalid prefixes or formats or file their application too early or late. Probably 50 percent of all applications for vanity call signs filed with the FCC are defective in one way or another. In short, it is the knowledgeable applicants who do their homework who get their desired call signs.

It is not uncommon for the FCC to receive ten or twenty (or more) vanity applications for a single preferential station call sign when a 1x2 or 2x1 format call sign is publicized as being available. The FCC awards vanity call signs by lottery (randomly) when more than one application is received for the same call sign on its first day of its availability. Competition is fierce and, for example, an applicant has a 90 percent chance of NOT getting a specific requested call sign if there are ten qualified applications

V. CALL SIGNS OF DECEASED AMATEURS

In addition, there are numerous active station call signs of deceased amateurs who died more than 2 years ago whose station call sign have not been canceled from the FCC's active amateur service database. These call signs can be made available to the vanity call sign system by providing the FCC with a copy of the deceased amateur's death certificate, newspaper obituary or information from the *Social Security Death Index*⁵. (SSDI.)

³ Among them are <www.ae7q.com>, <www.radioqth.net>, <www.qrz.com> and <www.vanityhq.com>.

⁴ See: <<http://wireless2.fcc.gov/UlsApp/UlsSearch/searchAmateur.jsp>>

⁵ The *Social Security Death Index* (SSDI) is a database of persons whose death has been reported to the U.S. Social Security Administration.

The procedure for handling so-called "silent key" cancellations and the subsequent application for this call sign is also widely publicized on various independent amateur radio websites⁶. To make the call sign of a deceased amateur available to the vanity call sign system, an applicant (a) causes the FCC to cancel the deceased's call sign and (b) then applies for that call sign (c) before it is processed by the FCC⁷.

By the time the amateur community learns of the cancellation, there is one (and sometimes more) pending vanity call sign applications for the call sign. The preferential call sign of a deceased amateur is usually easier to obtain than one routinely publicized to the amateur community because there is less competition for that call sign. The downside is that it takes considerable research effort to uncover these available "silent key" call signs.

Some vanity call sign applicants – and apparently the FCC – believe that this gives an unfair advantage to applicants for preferential call signs. I basically disagree. I believe the more knowledge an applicant has about the FCC's vanity call sign system rules and the availability of other FCC and privately available research information, the more probable an applicant is to get a station call sign of his/her choice. This is true with any call sign, not just those of a deceased radioamateur.

Why is it unfair for an applicant to use FCC and other publicly-available online vanity call sign information, manual call sign lists and information explaining how to obtain the call sign of a deceased amateur who is still shown as active in the FCC's amateur service database? This information is widely available to anyone.

The fact remains that few radioamateurs are familiar with the multitude of research information that is available to them. Many complain when someone else gets a call sign they wanted. I fail to see why it is unfair to other applicants for a specific call sign when a Vanity call sign applicant is merely using publically available information provided by the FCC⁸ and other private sector websites.

⁶ For example: <www.ae7q.com/text/SilentKey.php>, <www.eham.net/articles/13979>, and <www.radioqth.net/silentkeys.aspx>

⁷ All vanity call sign applications are processed by the FCC 18 days (excluding weekend and federal holidays) after receipt. This delay is to allow time for mailed in (paper) applications to arrive so that applications filed online will not have an unfair chance of receiving a specific call sign.

⁸ Section § 97.19(c)(3) states that "...the call sign shown on the license of the person now deceased is not available to the vanity call sign system for 2 years following the person's death, ..." The FCC's amateur service website (under *General Rules*) discusses how to notify the FCC of a licensee's death: "This is accomplished by submitting a signed request for license grant cancellation accompanied by a copy of an obituary or data from the *Social Security Death Index* that shows the date of death, or a death certificate, to FCC, 1270 Fairfield Road, Gettysburg, PA 17325-7245."

There is also an immediate online method⁹ to determine when the FCC staff handles manual cancellations and which call signs have been canceled. Some applicants for vanity call signs review manual cancellations¹⁰ on a daily basis to be the first to learn of a possible available preferential call sign.

I also do not believe the argument that vanity call sign applicants are unaware of the deaths of other amateurs. Since amateur radio is a communications hobby with other operators, almost no radioamateur dies in secret. Furthermore, these deaths are widely publicized in the amateur radio media, in various "silent key" listings¹¹ and postings, by various organizations, obituary listings, and such. The identity, call sign and date of death of many deceased radioamateurs can also be determined by simply entering search terms such as "silent key" into any online search engine.

Canceled call signs -- and those not renewed -- over a specific date range can be determined by using the FCC's amateur search function available on ULS. Very few radioamateurs relinquish a 1x2 or 2x1 format call sign by failing to renew their license. Using the FCC's ULS Amateur Search function, vanity call sign applicants can determine preferential call signs that were not renewed. The name of a potential deceased amateur with a preferential call sign can be compared with entries contained in the SSDI. The call sign is available for reassignment if the death occurred more than 2 years ago.

In addition, call sign applicants can search for likely call signs of deceased amateurs in many other ways. For example the QRZ.com and Buckmaster.com databases show birth years and, in some cases, the exact date of birth of many amateurs. Call sign applicants can use this information along with data from the *Social Security Death Index* to identify likely available call signs to cancel.¹²

In short, there are many ways to come up with potentially available preferential station call signs. Call sign applicants who know the rules, use FCC and private sector data and do the research are the ones that get the better station call signs.

⁹ The FCC's online *Universal Licensing System* (ULS) has built in programs that allows users to search for a multitude of data. Its availability has not been publicized and few users seem to know about it.

¹⁰ See: <<http://www.ae7q.com/list/ManCancels.php?COUNT=10>>

¹¹ QST, the ARRL Amateur Radio journal, routinely lists deceased radioamateurs and their call signs in their monthly "Silent Keys" section.

¹² An elderly amateur who didn't renew his preferential call sign can easily be determined as deceased. If he/she has been deceased more than 2 years his/her active call sign is available for cancellation and reassignment.

Canceling a call sign

The FCC has proposed to cancel the call sign of a deceased amateur in such a way that will allow a 30 day period between cancellation and wider publicized availability. An argument could be made, however, that this would be unfair to the applicant who took the time and effort to do the research necessary to uncover a desirable station call sign. There are no secret ways -- or unfair -- to get a good station call sign; all the information is readily available to everyone.

In the past, a deceased amateur's call sign was cancelled as of the date of death. This presents no problem if the deceased amateur has been dead less than 2 years since the call sign is not available for 2 years plus one day after expiration or cancellation.

The FCC's proposed wording of the new § 97.19(3)(iii) is very difficult to understand and needs to be simplified. If the FCC goes through with its proposal, I suggest the following:

"(4) Cancellation of call sign

(i) The station call sign of an amateur service licensee deceased less than 2 years will be canceled as of the date of death,

(ii) The station call sign of an amateur service licensee deceased more than 2 years will show a cancellation date of 2 years prior to the date the staff processes the cancellation plus 30 days."

VI. DEFINITION CLOSE RELATIVE

The legal definition "in-laws" are those people who are related to you by marriage (i.e.: your spouse's side of the family). We agree that the term "in-law" of a deceased former holder can be interpreted to include a great many distant relatives incurred by marriage such as Cousin-in-law, Niece/Nephew-in-law, Aunt/Uncle in law, etc.

The definitions proposed in § 97.3(a)(27) needs simplification and further clarification. We believe few people will know who the "spouse of a licensee's spouse's sibling" really is.

Perhaps some of these relationships can be simplified by using -- or at least clarified by including -- more widely accepted definitions. In-laws should be limited to the following:

Brother-in-law, the brother of one's wife, the husband of one's sister, the husband of your wife's sister.

Sister-in-law,	the sister of one's husband, the wife of one's brother, the wife of your husband's brother.
Daughter-in-law,	the wife of one's son or step-son.
Son-in-law,	the husband of one's daughter or step-daughter.
Father-in-law,	the father or step-father of your wife.
Mother-in-law,	the mother or step-mother of your husband.

VII. CODIFYING POLICIES INTO PART 97 RULES

The Commission proposes to specifically state in § 97.19(c)(2) of the rules that the 2 year requirement does not apply when the vanity call sign grant "...is surrendered, cancelled, revoked or voided, or set aside because the grantee acknowledged or the Commission determined that the grantee was not eligible..." to file early. Except for acknowledgments by the applicant, this is currently stated on the FCC's Amateur Service *Vanity Call Sign System* webpage.

While the FCC has investigated and some vanity call sign grants have been reversed, I am not aware that the Commission has actually revoked a call sign assignment. Instead, the applicant is given an opportunity to explain a seemingly improper application. If the applicant says that an error had been made, the call sign is changed and a new 2 year waiting period begins on the relinquished call sign. This "churning" of call signs with a new 2-year start date is unfair to other applicants of the call sign.¹³

In any event, it is very important that the FCC immediately publicize all vanity call signs that have been surrendered, canceled, revoked, voided, or set aside because the applicant was ineligible for the grant or made a mistake during the application process.

The Commission may want to add a 30 day period to the notification date ...similar to its proposal for handling call signs of deceased radioamateurs. This will allow more applicants to apply for the call sign.

¹³ Milton P. Wilson, K2SC, applied on 11/23/2009 for vanity call sign K4RL (the first day it was available) along with six other applicants. It was awarded to him on December 11, we assume by lottery. It was mysteriously canceled three weeks later (on January 5, 2010) for reasons that are unclear. The call sign is now not available to anyone until January 6, 2012. This applicant has held five different 1-by-2 preferential call signs, three of which were recently canceled. He is also able to reclaim any of these three call signs under the previous holder provision without waiting 2 years. All of this call sign activity may be legal, but it certainly ties up preferential call signs and makes a mockery of the vanity call sign program.

VIII. LIMITING CLUB STATIONS TO ONE CALL SIGN

There are currently more than 10,400 licensed amateur radio club stations. The Commission is correct when it says that club stations have an advantage over individuals seeking desirable call signs since they are not limited in the number of station call signs they may hold. I believe it is an unfair advantage.

Club station abuses are widespread. FCC records show that there are dozens of amateur club trustees overseeing multiple amateur radio club station call signs ... some as many as twenty. One trustee overseeing four clubs holds more than a dozen 1x2 format call signs.¹⁴ There are eighteen club trustees with three or more preferential club station (1x2 and 2x1) call signs.¹⁵ The FCC should investigate whether these clubs actually exist or are merely a mechanism to accumulate preferential call signs.

FCC records also show that there are 15 clubs where the trustee is another club rather than an individual.¹⁶ Section § 97.5(2) specifically states "A club station license is granted only to a person who is the license trustee designated by an officer of the club."

We investigated a couple of these. FCC records show the trustee of the Lakes Area Repeater Association, KC0WLB, is John G. Oehlenschlager, K0JO. Mr. Oehlenschlager died more than a year ago. The FCC's amateur service database now shows K0JO to be a club, the Wadena Area Amateur Radio Club.

FCC records also show that John W. Wittmann, WK8X, is the trustee of two clubs: the South Florida DX Assn. WA8CTC and the Rainbow Great Lakes Chapter, WA8PUD. John W. Wittmann, WK8X, died nearly 3 years ago. Now, WK8X is still another club, the Rainbow Amateur Radio Association. So the Lakes Area Repeater Association and the Rainbow GreatLakes Chapter do not have trustees.

Another club can not be the trustee of a club and the FCC should investigate how this -- and possibly many others -- happened. We also know of dozens of clubs where the trustee's amateur radio license has expired or been canceled. But the FCC

¹⁴ Alan C. Emerald, W1GA, P.O. Box 1041, Huntington Beach, Calif., is the trustee of the following club call signs K2OA, K6XA, K8OA, K6JA, K6GA, W0GA, W8GA, W2GA, K4RA, K2XA, N3GA, N1XA, N2XA, N7NA, N7GA, and W6HX. It is unclear why all these 1x2 call signs are needed.

¹⁵ The following trustees oversee multiple clubs and hold 3 or more 1x2 and 2x1 call signs. WA4AW, W6KK, W6DOE, K6TA, W7AB, W3JD, K6PYP, K1AJ, NY3E, K6TED, K4SWN, W6WU, W7ROB, W6RF, W7N1, N5AN, W6LL and WPO3A.

¹⁶ The following club call signs list another club as the trustee: KC0WLB, K1AN, K1NAN, KA2DIV, K4AAA, K4NNN, KG4YT1, KW4CW, W4JMD, NC6QH, W6SRS, WH6DGX, KL7FAA, WA8CTC and WK8X.

amateur service database still shows them to be the trustee of record¹⁷. These clubs also have no trustee.

The Commission seeks to remedy club station call sign abuses in the future by limiting clubs to one call sign. Section § 97.5(b)(2) would read "...no additional club station license grant(s) will be made to a club whose trustee already holds a club station license for that club." Clubs with more than one call sign would not be allowed to obtain any more call signs, **but could renew or modify their existing station licenses.**

While this is a step in the right direction it will not eliminate all of the excessive call sign hoarding since trustees and officers can just form more clubs ...each eligible for a single call sign. It would also not correct past abuses.

There is effectively little difference between one club with a dozen station call signs and a dozen "ghost" clubs with the same or different trustees formed by the same management each with a single preferential call sign. The former could be controlled by the FCC's proposal, but not the latter.

Ideally, all clubs should be required to forfeit all club call signs except one. Administratively, this may be difficult to implement. Alternatively, club stations with multiple call signs should be required to discontinue use of these additional club call signs when they expire and **they should not be eligible for renewal.**

There is a precedent for doing this. Effective March 24, 1978, the FCC announced their new ***"Amateur Station Call Sign Assignment System."*** One of the features of this system was that it phased out the issuance of secondary (additional) call signs by not renewing them.¹⁸

There is absolutely no reason for any club station to have more than one station call sign since Section 97.3(a)(25) and 97.119(c) authorizes the use of identifiers which

¹⁷ The amateur radio operator licenses of: K1BAY (David A. Dell) the trustee of W10OK the Northwest Michigan ARC; KC8KBF (Carolyn I. Donner) the trustee of K8SSJ, the USS Jurassic Club and K14FL (Jimmie L. Cantrell, Jr.) the trustee of W4EWI, the Union County Amateur Radio Club all have licenses that were canceled more than ten years ago! All three clubs are currently active .

¹⁸ "Secondary" call signs are additional station call signs (usually at a different address) issued by to FCC to a holder of a primary station license. In a ***FCC News*** bulletin dated March 30, 1978, the FCC said: "No new secondary ... station licenses will be issued. Existing licenses will not be renewed or modified, but may continue to operate until their expiration dates. We will permit a holder to transfer an existing secondary station call sign to the primary station anytime prior to expiration. The secondary station license will be cancelled at that time."

may be included with the club call sign.¹⁹ A unique identifier could be included with a club's primary call sign should an additional call sign be needed. Identifiers answer any perceived need to differentiate between stations operated by a club.

This does not solve the problem of a trustee or club management forming more clubs in order to obtain additional station call signs. One answer may be to preclude any trustee or club management from forming more than one club.

FCC enforcement action should be initiated when it is suspected that a club station has primarily been formed to gain access to a preferential call sign. The FCC rules²⁰ could also be tightened up by including the necessity for a club to retain membership records and "minutes" of all meetings held for a three year period.

Another extreme cure may be to eliminate future club licensing entirely such as the FCC did in the *Radio Amateur Civil Emergency Service* (RACES).

IX. NOVICE OPERATORS AS CLUB TRUSTEES

There is certainly no reason why a Novice Class radioamateur could not serve as an amateur radio club trustee. Actually, Novice operators as a whole may be more qualified than newly licensed Technician Class radioamateurs; the reason being that no Novice license grants have been issued since April 15, 2000 and they have at least ten years tenure.

X. OTHER CALL SIGN PROPOSALS

- The FCC's Amateur Service web pages pertaining to station call sign systems – especially the *Vanity Call Sign System* – need to be more detailed, better organized and rewritten. See outline suggestion in Appendix A.
- Many amateurs apply for seemingly available vanity call signs on which the FCC

¹⁹ **§ 97.3 Definitions.** (a)(25) Indicator. Words, letters or numerals appended to and separated from the call sign during the station identification.

§. 97.119 Station identification. (c) One or more indicators may be included with the call sign. Each indicator must be separated from the call sign by the slant mark (/) or by any suitable word that denotes the slant mark. If an indicator is self-assigned, it must be included before, after, or both before and after, the call sign. No self-assigned indicator may conflict with any other indicator specified by the FCC Rules or with any prefix assigned to another country.

²⁰ Currently Section 97.5(b)(2) requires only that a "... club must be composed of at least four persons and must have a name, a document of organization, management, and a primary purpose devoted to amateur service activities consistent with this part."

has already received applications. There should be something in the rules – or at least on the FCC's vanity call sign web pages – that states a specific call sign may not be assignable if it is pending assignment to another applicant.²¹ The FCC may want to publicize the existence of its Vanity Call Sign Application Search²² webpage that shows vanity call signs pending assignment.

- The FCC should consider abolishing Section 97.119(f)(1)(2)(3)²³ which mandates use of a self-assigned indicator (KT, AG, AE) by radioamateurs who have upgraded their license grant but whose grant has not yet appeared in the FCC amateur service database. This rule dates back to when it took weeks (or months) for the FCC in Gettysburg, PA, to manually key in license upgrade applications. The *Universal Licensing System* and application processing by *Volunteer-Examiner Coordinators* now permits the upgrade to show up in the database in just a few days.

The amateur community is able to notify the FCC if it notices operation by a licensee on frequencies other than authorized just as it does for any other radioamateur who is suspected of operating on spectrum not available to his/her class of operator license. (This suggestion may be beyond the scope of this NPRM, but should be considered none the less.)

- The FCC should consider adopting rules that prevents former holders of call signs from being assigned multiple preferential call signs, one right after another. Since former holders do not have to wait 2 years to reclaim a former call sign, an applicant can tie up a number of preferential call signs by simply applying for previously held call signs prior to the 2 year period when the call sign would be available to any other qualified applicant. (See next suggestion.)
- There is really no reason to have a 2 year wait to apply for a call sign that has been voluntarily relinquished by a radioamateur who applies for and is assigned another call sign. Consideration should be given to adding a relinquished call sign to the pool of available call signs 30 days after the new call sign's effective date. This would free up preferential call signs sooner and would prevent former

²¹ There is an 18 day lapse between vanity call sign application and assignment.

²² Located at: <<http://wireless2.fcc.gov/UlsApp/ApplicationSearch/searchVanity.jsp>>

²³ § 97.119 **Station Identification**

(f) When the control operator is a person who is exercising the rights and privileges authorized by Sec. 97.9(b) of this part, an indicator must be included after the call sign as follows:

- (1) For a control operator who has requested a license modification from Novice Class to Technician Class: KT;
- (2) For a control operator who has requested a license modification from Novice, Technician, or Technician Plus Class to General Class: AG;
- (3) For a control operator who has requested a license modification from Novice, Technician, Technician Plus, General or Advanced Class to Amateur Extra Class: AE.

holders from cycling through previously held preferential call signs.

- There is no need to allow radioamateurs to select up to 25 potential vanity call signs if they are chosen according to the rules. Twenty-five is excessive and the rules should be changed to permit no more than a maximum of six selections.
- There is currently no shortage of preferential (2-by-1) format call signs in Alaska since the prefix AL, KL, NL or WL followed by the numerals 0 through 9 and one suffix letter are available for assignment. There are 534 Extra Class radioamateurs in Alaska and 780 available 2x1 call signs.

There is, however a severe shortage of preferential call signs in Puerto Rico and Hawaii. Puerto Rico has 402 Extra Class amateurs but only 156 2x1 call signs available to them. Hawaii has 579 Extra Class amateurs, but only 208 2x1 call signs. The availability of preferential call signs in Puerto Rico and Hawaii is not equitable with the supply in Alaska.²⁴

The FCC should consider assigning the KP, NP and WP (Atlantic Area) prefix followed by the numeral: 6, 7, 8 or 9 to stations in Puerto Rico. These call sign prefix/numerals are not allocated to anyone and could alleviate the current KP3/KP4 preferential call sign shortage.

- The FCC should consider assigning the AH, KH, NH and WH (Pacific Area) prefix followed by the numeral 5 to stations in Hawaii. Palmyra or Jarvis Island and Kingman Reef are not served by the US Postal System -- nor will they ever be served by the USPS -- and are therefore ineligible to receive an AH5, KH5, NH5 or WH5 prefixed call sign. This could help alleviate the current AH, KH, NH or WH followed by 6 or 7 preferential call sign shortage.

XI. CONCLUSIONS

The Commission's intention to make information concerning the availability of preferential amateur service call signs more readily available and assignment more equitable is commendable. But the fact remains that the rules governing vanity amateur call signs are extremely complex. Even many long term licensed radio amateurs, more often than not, fail to take all of the variables into consideration when applying for a vanity call sign.

These governing variables include proper ITU and "Group" call sign prefixes and formats; non-contiguous U.S. prefix, numerical and suffix restrictions; numerous specifically excepted prefixes, suffixes and formats and priority filing rules concerning assignment of call signs to former holders, close relatives and clubs of former deceased

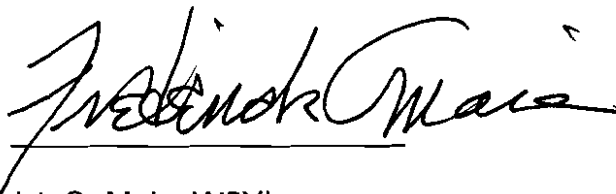
²⁴ Statistics are as of year end, 2009.

holders and members. Some stations are not eligible for a vanity call sign under any circumstances (military recreation and RACES.) We also note that some of the instructions on the FCC's amateur service web pages are wrong.²⁵

Add to that the confusion that exists concerning exactly when a specific call sign becomes available for reassignment, it is little wonder why many, and perhaps most, vanity call sign applications are defective in one way or another. The Commission's proposals will help only those seemingly few radioamateurs who understand the system.

The FCC needs to take action to curb the abuses that exist in the assignment of club station call signs.

Respectfully submitted,

By: 

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March 20, 2010

²⁵ For example, we note that the FCC's "Request Types: By List" rules on its website state that stations in Puerto Rico are eligible for call signs in "Regions 1 to 10, or Region 13 having numeral 6 or 7" (should be Region 12 having numeral 3 or 4) and stations in the Virgin Islands: "Regions 1 to 10, or Region 12 having numeral 3 or 4." (It should read Region 12 having numeral 2.)

Appendix A

Suggested format for reorganized Vanity Call Sign Section
FCC Website, Amateur Radio Service

The Vanity Call Sign System

- History
- Definition, description
- Section §97.19

Types of Vanity Call Signs

- Request by list
- Former holder
- Close relative of former holder
- Vanity call signs for clubs

Eligibility for Vanity Call Sign

- License class, Group call sign
- Call signs: Continental US addresses
- Call signs: Caribbean (Atlantic), Hawaii (Pacific), Alaska

What Vanity Call Signs are available to me?

- Determining available call signs
- Accessing FCC amateur service database
- Private sector call sign databases and information

What Vanity call signs are available to my club?

- Former holder
- Vanity may not be first call sign, CSCSA
- Call sign group of trustee applies
- Memorial call sign of ex-member

What call signs are not available to anyone?

- Excluded call signs, prefixes, suffixes, formats
- Call signs to areas with no USPS delivery
- Military recreation, RACES

When is a call sign available to me?

- Unassigned call signs
- Cancelled call signs
- Expired call signs
- Surrendered, revoked, set aside or voided call signs

How do I determine if the call sign I want is available?

- Searching for available call signs
- FCC database handling
- Checking for pending call sign assignments

Obtaining call sign of deceased holder

- When is a deceased amateurs call sign available to me?
- Canceling the active call sign of a deceased amateur
- Needed supporting documentation sent to FCC
- When deceased call sign is available to family member, club

Filing your Vanity call sign application

- FRNs, passwords, resetting password
- Filing electronically (online via ULS) step-by-step
- FCC Form 605, Schedule D
- Filing manually (paper document), step-by-step
- FCC regulatory fee handling, FCC Form 159, refunds
- Stress that regulatory fees are not related to the cost of issuing a call sign.
- Checking status of application
- When can use my new Vanity call sign?
- Renewing a vanity call sign

Obtaining help from FCC

- FCC's Consumer Center at 1-888-CALL-FCC (225-5322)
- ULS Customer Support Hotline at: 1-877-480-3201